

Alec H. Boyd (SBN 161325)  
CLYDE & CO US LLP  
150 California Street, 15<sup>th</sup> Floor  
San Francisco, CA 94111  
Telephone: (415) 365-9800  
Facsimile: (415) 365-9801  
Email: alec.boyd@clydeco.us

Joseph A. Bailey III (admitted pro hac vice)  
CLYDE & CO US LLP  
1775 Pennsylvania Avenue NW, Suite 400  
Washington, DC 20006  
Telephone: (202) 747-5100  
Facsimile: (202) 747-5150  
Email: joseph.bailey@clydeco.us

Attorneys for Defendant  
U.S. SPECIALTY INSURANCE COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

PETER KLEIDMAN,

Plaintiff,

v.

JONATHAN GASKIN; et al.

Defendants.

Case No. 4:22-cv-06355-HSG

**STIPULATION AND ORDER FOR  
BRIEFING SCHEDULE ON MOTION(S)  
TO DISMISS**

Complaint Filed: October 21, 2022

Pursuant to Civil Local Rule 6-2, by and through their respective attorneys of record, Plaintiff PETER KLEIDMAN ("Plaintiff") and Defendants JONATHAN GASKIN, BERNIE MURPHY, MICHAEL MAIDY, TIMOTHY COX, MARTIN PICHINSON, SHERWOOD PARTNERS, INC, U.S. SPECIALTY INSURANCE COMPANY and LESLIE QUIST (the "Initial Defendants"), hereby stipulate and request that the Court extend by fourteen (14) days the deadline for Initial Defendants to answer, move or otherwise respond to Plaintiff's First Amended Complaint [ECF No. 43], and enter a briefing schedule on the Motion(s) to Dismiss that the Initial Defendants intend to file in response to Plaintiff's First Amended Complaint, as follows:

**STIPULATION**

WHEREAS, on February 28, 2023, Plaintiff filed his Amended Complaint against Initial Defendants and three additional defendants, Chief Justice Guerrero, Administrative Presiding Justice Lui, and Administrative Presiding Justice Greenwood, on February 28, 2023 (ECF No. 43);

WHEREAS, the Clerk of Court issued the Summons for the Amended Complaint on March 1, 2023, terminating the pending Motion to Dismiss (ECF No. 24) and vacating the May 4, 2023 hearing on the Initial Defendants' motion to dismiss Plaintiff's original Complaint;

WHEREAS, the Clerk set the deadline for Initial Defendants to answer, move or otherwise respond to the Amended Complaint for March 14, 2023;

WHEREAS, in order to coordinate and where possible consolidate their responses, Initial Defendants request an additional fourteen (14) days to answer, move or otherwise respond to the Complaint, until March 28, 2023, and Plaintiff has agreed to stipulate to this extension in return for Initial Defendants' agreement to the following briefing schedule on Initial Defendants' Motion(s) to Dismiss: Plaintiff would have twenty-eight (28) days to oppose Initial Defendants' Motion(s) to Dismiss, and Initial Defendants would have fourteen (14) days to reply to Plaintiff's opposition to Initial Defendants' Motion(s) to Dismiss;

WHEREAS, the only other extensions of time in this case were the stipulated extensions of the deadline for Initial Defendants to answer, move or otherwise respond to the Complaint (ECF Nos. 19, 21) and an extension of time for Plaintiff to respond to the motion requesting that he be declared a vexatious litigant (ECF No. 41);

WHEREAS, the above requested extension would not affect the hearing date on Initial Defendants' not-yet-filed motion(s) to dismiss or any other dates in this case;

NOW, THEREFORE, based on the foregoing, the parties hereby stipulate and move the Court for an order extending the deadline for Initial Defendants to respond to the Amended Complaint by fourteen (14) days, to March 28, 2023; and extending the deadline for Plaintiff to oppose Initial Defendants' motion(s) to dismiss by fourteen (14) days (for a total of twenty-eight (28) days); and extending Initial Defendants' deadline to reply to Plaintiff's opposition by seven (7) days (for a total of fourteen (14) days).

IT IS SO STIPULATED, SUBJECT TO COURT APPROVAL.

Dated: March 2, 2023

Respectfully submitted,

By: /s/ Joseph A. Bailey III  
Alec H. Boyd  
Joseph A. Bailey III (admitted pro hac vice)<sup>1</sup>  
CLYDE & CO US LLP

*Attorneys for Defendant  
U.S. Specialty Insurance Company*

Dated: March 2, 2023

/s/ Peter Kleidman  
Peter Kleidman  
IN PRO PER

*Plaintiff*

Dated: March 2, 2023

/s/ Steve Kaufhold  
Steve Kaufhold  
KAUFHOLD GASKIN GALLAGHER LLP

*Attorney for Defendant Jonathan Gaskin*

Dated: March 2, 2023

/s/ Alan Martini  
Alan Martini  
SHEUERMAN, MARTINI, TABARI, ZENERE &  
GARVIN, P.C.

*Attorney for Defendant Leslie Quist*

Dated: March 2, 2023

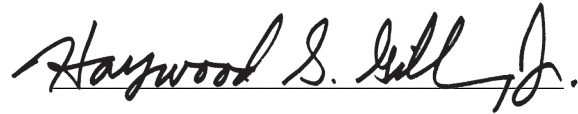
/s/ Matthew J. Olson  
Matthew J. Olson  
DORSEY & WHITNEY LLP

*Attorney for Sherwood Partners, LLC; Bernie  
Murphy; Martin Pichinson; Michael Maidy;  
Timothy Cox*

<sup>1</sup> Pursuant to Civil Local Rule 5-1, the filing attorney certifies that he or she has on file original signatures (in the form of email authorizations) for any signatures indicated only with a conformed signature.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2  
3 DATED: 3/7/2023

4  
5 

6 The Honorable Haywood S. Gilliam, Jr.  
7 United States District Judge  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

CLYDE & CO US LLP  
150 California Street, 15th Floor  
San Francisco, California 94111  
Telephone: (415) 365-9800